

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

OCT - 5 2022

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
v.)
Plaintiff,)
MICHAEL LITTLEJOHN,)
Defendant.)

4:22CR548 CDP/PLC

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and J. Christian Goeke, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with four counts of Distribution of Fentanyl and Possession with Intent to Distribute Fentanyl in excess of forty grams in violation of 21 U.S.C. § 841(a), Possession of a Firearm in Connection with Drug Trafficking Crime in violation of 18 U.S.C. § 924(c) and being a Felon in Possession of a Firearm in violation of 18 U.S.C. § 922(g)(1), an offense for which a maximum 10-year imprisonment is prescribed.

2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the

community.

3. According to St. Louis County Police Department complaint number 22-21672, in May 2022, Detectives with the St. Louis County Police Department Bureau of Drug Enforcement received information from a confidential informant that an unknown black male using cell phone number 314-348-5927 to distribute fentanyl.

4. On June 8, 2022, an undercover detective (UC) called the cell phone in an attempt to initiate a covert purchase of fentanyl. The UC spoke with an unknown male and negotiated the purchase of \$100 worth of fentanyl. The unknown male directed the UC to drive to Farlin Avenue after which a male subject, later identified as Defendant, approached the UC vehicle and in exchange for \$100 gave the UC 58 multi-colored capsules containing white powder that tested positive for fentanyl.

5. On June 29, 2022, the UC again called the cell phone and negotiated the purchase of \$100 worth of fentanyl. Defendant directed the UC to drive to 1347 Kappel Drive after which a grey Audi A5 pulled next to the UC vehicle and Defendant in exchange for \$100 gave the UC 50 multi-colored capsules containing white powder that tested positive for fentanyl.

6. On July 14, 2022, the UC again called the cell phone and negotiated the purchase of \$100 worth of fentanyl. Defendant directed the UC to drive to an alley at College and Linton Avenues 1347 Kappel Drive after which Defendant approached the UC vehicle and in exchange for \$100 gave the UC 47 multi-colored capsules containing white powder that tested positive for fentanyl.

7. On July 20, 2022, the UC again called the cell phone and negotiated the purchase of \$100 worth of fentanyl. Defendant directed the UC to drive to 8307 Delmar Blvd. after which Defendant approached the UC vehicle and in exchange for \$100 gave the UC 48 multi-colored

capsules containing white powder that tested positive for fentanyl. All four of the drug transactions were captured on a kel audiotape recording.

8. According to St. Louis Metropolitan Police Department complaint number 22028505, On June 30, 2022, officers with the St. Louis Metropolitan Police Department observed a grey Audi A5 commit a traffic violation Partridge Avenue and activated their emergency lights and siren to initiate a traffic stop. The Audi fled at high rate of speed in a reckless manner with police in pursuit. Other officers in the area deployed a spike strip deflating the rear tire of the Audi and the Audi continued to fail to stop with police still in pursuit during which officers observed a handgun and a large plastic baggie thrown out of the front passenger window. The Audi eventually came to a stop and the officers approached and located a driver and Defendant, who was the front seat passenger. The firearm and plastic baggies were located and seized. The firearm was determined to be a fully loaded FNH USA FNP-45 model .45 caliber semi-automatic pistol that was stolen. The plastic baggie contained 2064 multi-colored capsules containing white powder that tested positive for fentanyl (132.22 grams).

9. The nature and circumstances of the offense charged, which included on-going distribution of fentanyl and possession of a large amount of fentanyl while possessing a firearm, reflects that there is a serious danger to the community that would be posed by the defendant's release.

10. Due to the weight of the evidence, as well as because the amount of fentanyl seized, if convicted Defendant is facing a mandatory minimum sentence of five (5) years pursuant to 21 U.S.C. § 841(b)(1)(B)(viii) and a mandatory minimum consecutive sentence of five (5) years pursuant to 18 U.S.C. § 924(c), there is a serious risk that the defendant will flee.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,
SAYLER A. FLEMING
United States Attorney

/s/ J. Christian Goeke
J. CHRISTIAN GOEKE, #39462(MO)
Assistant United States Attorney